

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

NEW GEORGIA PROJECT, *et al.*

*Plaintiffs,*

v.

Civil Action No. 1:24-cv-03412-SDG

BRAD RAFFENSPERGER, in his  
official capacity as Secretary of State of  
the State of Georgia, *et al.*

*Defendants.*

**RICHMOND COUNTY DEFENDANTS' MOTION TO  
DISMISS PLAINTIFFS' FIRST AMENDED COMPLAINT**

COME NOW TIM MCFALLS, MARCIA BROWN, ISAAC MCADAMS, SHERRY BARNES AND BETTY REECE, and, in their official capacities as members of the RICHMOND COUNTY BOARD OF ELECTIONS (collectively the "Richmond County BOE") move to dismiss Plaintiffs' Consolidated First Amended Complaint [Doc. 155] in its entirety pursuant to Fed. R. Civ. P. 12(b)(1) and (6) as Plaintiffs lack standing and fail to state a claim upon which relief may be granted.

In support of this motion, the Richmond County Defendants hereby adopt the arguments set forth in State Defendants' Brief in Support of Motion to Dismiss [Doc. 168-1] ("State's Brief"), except that the Richmond County Defendants do not adopt State Defendants' arguments regarding traceability to and redressability by State

Defendants in Sections II(D) and II(E) of the State's Brief.

For all the reasons set forth in State Defendants' Motion to Dismiss and adopted herein, except as to the arguments regarding traceability to and redressability by State Defendants in Sections II(D) and II(E), this Court should dismiss Plaintiffs' claims against Richmond County Defendants.

Respectfully submitted this 17th day of February, 2025.

/s/ Lanetha Pitts

Lanetha Pitts

Georgia Bar No. 573571

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**CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 5.1**

The undersigned hereby certifies that the foregoing document has been prepared in accordance with the font type and margin requirements of Local Rule 5.1 of the Northern District of Georgia, using a font type of Times New Roman and a point size of 14.

/s/ Lanetha Pitts

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**CERTIFICATE OF SERVICE**

I hereby certify that on February 17, 2025, I electronically filed the foregoing RICHMOND COUNTY DEFENDANTS' MOTION TO DISMISS with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to all attorneys of record.

/s/ Lanetha Pitts

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